

1 D. GEORGE SWEIGERT, C/O
2 336 BON AIR CENTER #241
3 GREENBRAE, CA 94904

4
5 IN THE UNITED STATES DISTRICT COURT
6 FOR THE DISTRICT OF SOUTH CAROLINA

7 D. GEORGE SWEIGERT

8 Plaintiff,

9 vs.

10 JASON GOODMAN

11 Defendant

12 Case No.: 2:18-cv-01633-RMG-BM

13 PLAINTIFF'S SHOW CAUSE MOTION AS TO WHY
14 THE DEFENDANT SHOULD NOT BE DEEMED TO
15 HAVE RECEIVED CONSTRUCTIVE NOTICE OF
16 PENDING LAWSUIT

17
18 NOW COMES THE PRO SE plaintiff, a layman non-attorney, to MOTION this Court as to why the
19 defendant should not be deemed to have been constructively served with notice of this lawsuit. Restated: the
20 plaintiff requests that this Court deem Jason Goodman, defendant, to have received imputed knowledge of this
21 instant lawsuit.

22
23 **MOTION**

24
25 Defendant Jason Goodman operates at least one YouTube social media channel known as "JASON
26 GOODMAN". As described in the accompanying PLAINTIFF'S FIRST REQUEST FOR JUDICIAL NOTICE
27 [RJN]", Mr. Goodman, accompanied by two licensed attorneys, has broadcast for publication an extensive analysis
28 of the original complaint [Doc.1, 6/14/2018, Complaint] to a world-wide YouTube audience. Additionally, Mr.
Goodman demonstrates his proficiency with the PACER court database to locate the original complaint [Doc.1,
6/14/2018, Complaint] in this video broadcast.

29
30 The RJN includes a copy of the court docket from related litigation. This docket indicates that a draft copy
31 of the original complaint was forwarded to Mr. Goodman attached to a document known as "Seventh Declaration of
32 D. George Sweigert, Doc.60, 6/13/2018" (See Steele vs. Goodman, 3:17-cv-00601-MHL, U.S.D.C. for the Eastern
33 District of Virginia) in the related litigation. Therefore, Mr. Goodman has received an un-docketed copy of the
34 original complaint several weeks ago.

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DISCUSSION

Defendant Goodman has provided publication of this instant lawsuit to himself and almost six thousand viewers (**5.9K+, RJN**) on one (of many) of the defendant's YouTube channels. This YouTube publication by the defendant to himself should be deemed as a self-referential notice of litigation. *Isaiah Walker Jr. v. Harvey Soule*, 138 Mass. (1884), *Heap v. Heap*, 258 Mich. 250, 242 N.W. 252 (1932).

The brazen broadcast of the original complaint and PACER entries to the world-wide YouTube audience should spare the plaintiff of unnecessary expense to serve the summons upon the defendant in this litigation.

PRAYER

The plaintiff prays that this Court will deem the defendant Jason Goodman to have received constructive notice of this lawsuit for the purposes of accruing time to respond to the Amended Complaint [Doc.5, 6/29/2018].

Dated this day of July 7, 2018

D. GEORGE SWEIGERT

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13 CERTIFICATE OF SERVICE

14
15 On this day, July 2, 2018, I have caused to be placed into the U.S. Postal Service true copies of the
16 attached pleadings (Notice of Harmless Error, Show Cause Motion, Request for Judicial Notice) with First
17 Class postage affixed to the following parties.

18
19 Clerk of the Court
U.S. District Court
Matthew J. Perry, Jr. Courthouse
901 Richland Street
Columbia, South Carolina 29201

20
21 Jason Goodman
252 7th Avenue #6S
New York, NY 10001

22 I hereby attest under the penalties of perjury that the foregoing is true and accurate.

23
24 
D. GEORGE SWEIGERT

RECEIVED
USDC CLERK, COLUMBIA, SC
2018 JUL -5 AM 11:35

25
26
27
28 CERTIFICATE OF SERVICE - 1